

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Hrg. Date: 1/21/2025 at 1:00 p.m. (Eastern)**

**Obj. Due: 1/14/2025 at 4:00 p.m. (Eastern)**

**NOTICE OF D.H. PACE COMPANY, INC.'S MOTION FOR ALLOWANCE  
OF ADMINISTRATIVE EXPENSE CLAIM AND TO COMPEL PAYMENT**

**PLEASE TAKE NOTICE** that, on January 3, 2025, D.H. Pace Company, Inc. (“D.H. Pace”) filed *D.H. Pace Company, Inc.’s Motion for Allowance of Administrative Expense Claim and to Compel Payment* (the “Motion”)<sup>2</sup> with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion must be in writing, filed with the Clerk of the Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon Counsel to D.H. Pace, Chipman Brown Cicero & Cole, LLP, Attn: Mark L. Desgrosseilliers, desgross@chipmanbrown.com, Hercules Plaza, 1313 N. Market St., Suite 5400, Wilmington, DE 19801, so as to be received on or before January 14, 2025 at 4:00 P.M. (Eastern).

**PLEASE TAKE FURTHER NOTICE** that, if any objections to the Motion are received, the Motion and such objection shall be considered at a hearing before The Honorable J. Kate Stickles, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 6, Wilmington, Delaware 19801 on January 21, 2025, at 1:00 p.m. (Eastern).

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); Big Lots Stores - CSR, LLC (6182); BLBO Tenant, LLC (0552); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277).

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OF HEARING.**

DATED: January 3, 2025

Respectfully submitted,

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ Mark L. Desgrosseilliers

Mark L. Desgrosseilliers

Hercules Plaza

1313 N. Market Street, Suite 5400

Wilmington, DE 19801

Telephone: 302.295.0192

Facsimile: 302.295.0199

Email: desgross@chipmanbrown.com

*Counsel for D.H. Pace Company, Inc.*